

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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UNITED STATES OF AMERICA,  
Plaintiff,

v.

Criminal File No. 23-CR-75 (SRN/TNL)

SALLU DION SARJOH,  
Defendant.

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**DEFENDANT SALLU DION SARJOH'S  
MOTION FOR BRADY MATERIAL**

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The defendant, Sallu Dion Sarjoh, by and through counsel, George R. Dunn, respectfully moves the Court for an Order compelling the government to immediately disclose all favorable or exculpatory evidence, including:

1. Evidence favorable to the defendant and material to either guilt or to punishment.
2. The existence of witnesses favorable to the defendant.
3. Evidence of identification of persons other than the defendant by eyewitnesses to criminal activity alleged in the Indictment.
4. Evidence of fingerprints, handwriting, or scientific evidence which is not identified with this defendant.
5. Evidence of items seized from parties not named in the Indictment which tends to identify them, and not the defendant, with the commission of the crime.
6. Evidence which detracts from the credibility or probative value of both testimony and other evidence used by the government.

7. Evidence of promises made to any witness by the government related to his/her testimony and/or cooperation, including, but not limited to: monetary payments, tax concessions, immigration treatment, relief from forfeiture, charging decisions, and treatment of family members. Included in this request are the written or oral contracts between the witness and the government, plea agreements, letters memorializing offers, and notes of conversations between the witness and agents for the government. Disclosure of the witnesses to be called at trial is also requested, along with any contradictory statements by them.

8. Evidence of misconduct by government witnesses, including false statements, arrests, and convictions.

This motion is based on review of the Indictment, pleadings, record, and discovery that have been produced to date. Defendant also wishes to incorporate such testimony as may be presented at the motion hearing and be given an opportunity to brief relevant issues for the Court as may be required thereafter.

Dated: April 18, 2023

Respectfully submitted,  
TILTON DUNN GROSS P.L.L.P.  
s/ George R. Dunn  
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